

1 The Honorable John H. Chun
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MALVIKA SHARMA *et al.*,) No.: 2:23-cv-01227-JHC
Plaintiff,)
vs.) STIPULATED MOTION AND ORDER TO
DEPARTMENT OF HOMELAND) CONTINUE DEADLINES
SECURITY,)
Defendant.)
NOTED FOR CONSIDERATION:
October 19, 2023

STIPULATION

The Parties through their respective counsel, pursuant to Federal Rule of Civil Procedure 6 and Local Rules 10(g) and 16, and hereby jointly stipulate and move for a 60-day extension of the deadline for Defendant to respond to the Complaint. The response is currently due October 20, 2023. A 60-day extension would make the response due December 19, 2023. No other extensions have been requested in this case.

A court may modify a deadline for good cause. Fed. R. Civ. P. 6(b). Continuing pretrial and trial dates is within the discretion of the trial judge. *See King v. State of California*, 784 F.2d 910, 912 (9th Cir. 1986).

The parties submit there is good cause for an extension of the deadlines. The First Amended Complaint (“FAC”) in this matter includes over 90 individual plaintiffs. Although the

1 FAC includes a table of receipt numbers associated with USCIS files, it nonetheless takes
2 significant time to identify each file, confirm it is the correct file, review the contents of it, and
3 determine the situation of each individual plaintiff. Furthermore, the files are kept at multiple
4 service centers around the country. In addition to identification and review of the files, counsel for
5 Defendant must coordinate with multiple agencies within the Department of Homeland Security
6 regarding this litigation. Though the Defendant and its counsel have been working diligently, more
7 time is needed to understand the underlying facts and prepare a responsive pleading. A 60-day
8 extension of time will give the Defendant and its counsel time to understand the facts surrounding
9 each individual plaintiff and the case as a whole and to prepare a responsive pleading.

10 No other deadlines have yet to be set in this case, and thus no other deadlines need to be
11 extended at this time.

12 Therefore, the parties agree to and propose that the Defendant respond to the Complaint no
13 later than December 19, 2023.

14 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

15 DATED: October 19, 2023

s/Jesse M. Bless

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Jesse@BlessLitigation.com
Attorney for Plaintiffs

19 DATED: October 19, 2023

s/Alexandra McTague

Alexandra McTague
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Civil Division
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Attorney for Defendant

ORDER

IT IS SO ORDERED.

Dated this 19th day of October, 2023.

John H. Chun
The Honorable John H. Chun
United States District Court Judge